

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JANE DOE,

Plaintiff

V.

AETNA LIFE INSURANCE COMPANY,  
AND BANK OF AMERICA CORPORATION  
LONG TERM DISABILITY PLAN,

Defendants

CIVIL ACTION NO.

**MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION FOR  
LEAVE TO PROCEED UNDER A PSEUDONYM AND TO IMPOUND THE  
RECORD OF THE PROCEEDINGS**

This Memorandum is submitted in support of the Plaintiff, Jane Doe's motion: (1) for an order granting leave to proceed with her complaint under a pseudonym; and (2) for an order directing the Clerk to seal and impound the complaint filed with this Court, the Plaintiff's affidavit submitted in support of this motion, and all subsequent documents containing any medical and/or identifying information associated with this proceeding. In support of her Motion, the Plaintiff states that this suit, in which Plaintiff seeks recovery of disability benefits owed to her under a long term disability insurance plan, concerns the Plaintiff's medical condition, including her combined physical and mental health diagnoses. These issues reach into the utmost private areas of the Plaintiff's life and are at the cornerstone of the dispute in this case. Public disclosure of the Plaintiff's name and the pleadings and proceedings in this action, would have a severe, damaging impact on the